

## INDUSTRIAL USER GENERAL PERMIT

### TRANSMITTAL LETTER

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Tim Garrett  
Dana Sealing Manufacturer LLC  
P.O. Box 599  
1201 E. Victor Dana Road  
Robinson, Illinois 62454

RE: Issuance of General Industrial User Permit to Victor Dana Corporation  
by the City of Robinson  
Permit No. RD20 **(FINAL)**

Dear Tim:

The enclosed RD20 covers the wastewater discharged from the facility located at 1201 E. Victor Dana Road into the City of Robinson sewer collection system. All discharges from this facility and actions and reports relating thereto shall be in accordance with the terms and conditions of this permit.

In consideration of the granting of this permit, the applicant agrees:

1. To furnish any additional information on industrial wastewater discharges as required by the Superintendent.
2. To operate and maintain any required industrial wastewater treatment devices in an approved manner.
3. To cooperate at all times with the City of Robinson personnel, or their representatives, in the inspection, sampling, and study of industrial wastewater treatment facilities and discharges.
4. To notify the Superintendent in the event of any accident, negligence or other occurrence that causes discharge to the sewer of a nature or quantity of material which could constitute a hazard to plant personnel, facilities, or the environment.
5. To submit, as required by the City of Robinson, accurate data on industrial wastewater discharge flows and wastewater constituents.
6. To apply for a revised industrial wastewater permit if any change in industrial processes or operations creates a change in industrial wastewater quality or quantity.
7. To provide immediate access to authorized personnel of the City, State, or Federal Agency to any facility directly or indirectly connected to the City's sewerage system under emergency conditions and at all other reasonable times.
8. This permit is subject to the Non-Transferability provisions contained in Robinson's Pretreatment Ordinance Number 20-0-30, Section 5.5.
9. Request for permit modification is required 90 days prior to implementation. Permit modification must be complete prior to changes being implemented.

10. The permittee shall retain all monitoring information, including all calibration and maintenance records, operations and maintenance data, and reports required by this permit for a period of at least 3 years from the date of this permit.
11. The permittee is subject to Civil and Criminal penalties contained in Robinson's Enforcement Response Guide (E.R.G.) if in violation of this permit.

If you wish to appeal or challenge any condition imposed in this permit, a petition shall be filed for modification or reissuance of this permit in accordance with the requirements of Section 5.3 of the Robinson Pretreatment Ordinance, within 30 days of your receipt of this correspondence. Pursuant to Section 5.3 of the Robinson Pretreatment Ordinance, failure to petition for reconsideration of the permit within the allotted time is deemed a waiver by the permittee of his right to challenge the terms of this permit.

Official Seal of The City of Robinson

By: Lawrence E. Quick  
Superintendent WWTF

Issued this 1st day of December, 2020.

Permit No. RD20

## INDUSTRIAL USER PERMIT

In accordance with the provisions of Section 5 of the Robinson Pretreatment Ordinance.

Dana Sealing Manufacturer LLC  
P.O. Box 599  
1201 E. Victor Dana Road  
Robinson, Illinois 62454

is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein into the City of Robinson sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulations, standards or requirements under local, State, and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of Robinson Pretreatment Ordinance.

This permit shall become effective on December 01, 2020, and shall expire on November 30, 2025. Should the permittee wish to continue to discharge after the expiration date of the permit, an application must be filed for a renewal permit in accordance with the requirements of section 5.7 of the Robinson Pretreatment Ordinance, a minimum of 180 days prior to the expiration of this permit.

Official Seal of the City of Robinson

By: Lawrence E. Quick  
Superintendent WWTF

Issued this 1st day of December, 2020.

## PART 1 - EFFLUENT LIMITATIONS

### A. Description of Outfalls

During the term of this Permit, the permittee is authorized to discharge process wastewater to the City of Robinson sanitary sewer system from the outfalls listed below.

<u>Outfall</u>	<u>Description</u>
001	Sampling manhole located on north edge of parking lot, north of Administrative offices.

### B. Effluent Limitations

During the period of December 01, 2020 until the end of this Permit, the discharge from outfall 001 shall not exceed the Local Limits in PART 2.

## PART 2 – LOCAL LIMITS

No discharger shall discharge or cause or allow to be discharged into the sewerage system any pollutant in concentrations above those specifically permitted in a Wastewater Discharge Permit Issues by the City. Discharge Permits shall impose maximum discharge concentration limits or mass based limits where appropriate. The Superintendent may, upon good cause shown, establish wastewater permit limits below a local limit concentration set forth in this Section. In the absence of such specific wastewater discharge permit conditions, no person shall discharge any of the following pollutants except as such pollutants may occur, and only in the concentrations such pollutants may occur, in the potable water supplied to the premises.

<u>Local Limits Parameters</u>	
pH	Cyanide
Oil & Grease	Total Iron
Total Suspended Solids (TSS)	Lead
Biochemical Oxygen Demand (BOD <sup>5</sup> )	Mercury
Arsenic	Nickel
Ammonia Nitrogen as N	Manganese
Cadmium	Zinc
Chromium (hexavalent)	
Total Chromium	
Copper	
Total Phosphorus as P	

## PART 2 – LOCAL LIMITS (CONTINUED)

**NOTE:**

Local Limits samples will be collected and analyzed annually between October 1 through November 30, or as directed by the Superintendent. The deadline for the results of these analyses shall be reported to the Superintendent by December 15th on Self-Monitoring Report Forms approved by the Superintendent. (SAMPLING SHALL BE DONE DURING the fourth (4th) calendar quarter). All sampling discharge results must be reported to the City of Robinson Wastewater Superintendent.

## Pretreatment Ordinance

During the term of this permit, the permittee shall also comply with the Prohibited Discharge Standards set forth in the City of Robinson Pretreatment Ordinance (Section 2.1).

## Compliance

All discharges shall comply with all other applicable laws, regulations, standards, and requirements contained in The City of Robinson Pretreatment Ordinance, and any applicable State and Federal pretreatment laws, regulations, standards, or requirements that may become effective during the term of this permit.

## PART 3 - MONITORING REQUIREMENTS

- A. From the period beginning on the effective date of the permit, until the end of this permit, the permittee shall monitor outfall 001 for the following parameters, at the indicated frequency.

<u>Sample Parameter (limit/units)</u>	<u>Measurement Location</u>	<u>Frequency</u>	*	
			<u>Sample</u>	<u>Type</u>
0.10 mg/L arsenic	Outfall 001	1/yr	24 hr	Composite
0.13 mg/L cadmium	Outfall 001	1/yr	24 hr	Composite
0.27 mg/L chromium (hex)	Outfall 001	1/yr	24 hr	Composite
0.70 mg/L chromium (total)	Outfall 001	1/yr	24 hr	Composite
0.94 mg/L copper	Outfall 001	1/yr	24 hr	Composite

## PART 3 - MONITORING REQUIREMENTS (CONTINUED)

0.91	mg/L cyanide	Outfall 001	1/yr	24 hr Composite
4.20	mg/L iron (total)	Outfall 001	1/yr	24 hr Composite
0.42	mg/L lead	Outfall 001	1/yr	24 hr Composite
0.0138	mg/L mercury	Outfall 001	1/yr	24 hr Composite
1.11	mg/L nickel	Outfall 001	1/yr	24 hr Composite
10.0	mg/L manganese	Outfall 001	1/yr	24 hr Composite
0.96	mg/L zinc	Outfall 001	1/yr	24 hr Composite
300	mg/L BOD Mo Avg	Outfall 001	1/yr	24 hr Composite
350	mg/L TSS Mo Avg	Outfall 001	1/yr	24 hr Composite
20	mg/L NH <sub>3</sub> -N	Outfall 001	1/yr	24 hr Composite
10	mg/L Phosphorus (total)	Outfall 001	1/yr	24 hr Composite
Daily Min. 5.0 Daily Max 9.5 pH		Outfall 001	1/yr	Grab
Oil & Grease Daily Max. 100 mg/L		Outfall 001	1/yr	Grab
Oil & Grease Mo Avg. 80 mg/L		Outfall 001	1/yr	Grab

- \* All 24 hour Composite samples shall be either flow proportional, or time proportional with sample collection at least every 30 minutes.
- B. All handling and preservation of collected samples and laboratory analysis of samples shall be performed in accordance with 40 CFR Part 136 and amendments thereto unless specified otherwise in the monitoring conditions of this permit.
- C. Regular cleaning and maintenance shall be performed on the automatic sampler, pH, and flow measurement equipment to ensure proper operation and to ensure representative samples are being taken on a continual basis. In the event that the composite sampler becomes inoperative, the monthly average will be substituted for those days. The sampler shall be repaired and placed back in operation as soon as possible.

### PART 3 - MONITORING REQUIREMENTS (CONTINUED)

- D. The user shall keep accurate records of any cleaning or maintenance of wastewater flow measurement systems and shall have the accuracy and totalizer reading of the system checked and noted on a regular basis. All parts of the system which require cleaning to maintain meter accuracy shall be cleaned at the manufacturer's suggested frequency and/or the interval required herein. The "zero level" of the indicator and recorder shall be verified each time to ensure that the flows are recorded correctly.
- E. All flow monitoring systems used to obtain flow information for submittal to the City shall have the calibration of the system inspected quarterly. The quarterly calibration inspections may be instrumentation calibrations. The instrumentation calibration shall confirm that the actual flow rates are accurately measured by the primary measuring device and transmitted to the flow recorder and totalizer. The instrumentation shall be checked at three flow rates covering the normal range of operation. A summary of the calibration shall be recorded and a copy sent to the Superintendent.
- F. The flow measurement system maintenance and calibration records shall be maintained by the user and shall be made available upon request to representatives of the City.
- G. The permittee shall be responsible for maintaining and cleaning the sampling point to prevent any buildup of oil, grease, sediment or sludge. Failure to do so does not invalidate sampling test results. Analytical results from samples obtained from these locations which are completed according to accepted testing procedures shall be accepted as binding. Safe and convenient access to all on-site sampling points shall be provided for representatives of the City.

### PART 4 - REPORTING REQUIREMENTS

#### A. Monitoring Reports

Monitoring results obtained shall be summarized and reported on a form which clearly shows Industrial User monitoring results once per year. The report is due on December 15<sup>th</sup> each year. The report shall indicate the nature and concentration of all pollutants in the effluent for which sampling and analysis were performed during the calendar year preceding the submission of each report including measured maximum and average daily flows if an approved flow measuring device is used.

#### B. Monitoring Frequency

If the permittee monitors any pollutant more frequently than required by this permit, using test procedures prescribed in 40 CFR Part 136 or amendments thereto, or otherwise approved by EPA or as specified in this permit, the results of such monitoring shall be included in any calculation of actual daily maximum or monthly average pollutant discharge and results shall be reported in the monthly report submitted to the City of Robinson. Such increased monitoring frequency shall also be indicated in the monthly report.

## PART 4 - REPORTING REQUIREMENTS (CONTINUED)

### C. Automatic Resampling

If the results of the permittee's wastewater analysis indicate that a violation of this permit has occurred, the permittee must:

1. Inform the City of Robinson Superintendent of the violation within 24 hours; and
2. Repeat the sampling and pollutant analysis and submit, in writing, the results of the second analysis within 5 days of the first violation.

### D. Accidental Discharge Report

1. The permittee shall notify the City of Robinson Superintendent immediately upon the occurrence of an accidental discharge of substances prohibited by Section 2 of the Robinson Pretreatment Ordinance or any slug loads or spills that may enter the public sewer.
2. During normal business hours the City of Robinson should be notified by telephone at (618) 544-8119, or (618) 562-0040. If no response, and at all other times, the City of Robinson Police Department shall be notified at (618) 546-1515. The notification shall include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken. The permittee's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements that arise under local, State, or Federal Laws.
3. Within five days following an accidental discharge, the permittee shall submit to the City of Robinson Superintendent a detailed written report. The report shall specify:
  - a. Description and cause of the upset, slug load, or accidental discharge, the cause thereof, and the impact on the permittee's compliance status. The description should also include location of discharge, type, concentration and volume of waste.
  - b. Duration of noncompliance, including exact dates and times of noncompliance and, if the noncompliance is continuing, the time by which compliance is reasonably expected to occur.
  - c. All steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, or other conditions of noncompliance.



4. The permittee shall also follow all policies and procedures prescribed in 40 CFR 403.12 (p) concerning Discharge of Hazardous Waste as set forth in 40 CFR Part 261. The Permittee shall notify the POTW, the EPA Regional Waste Management Division Director and state hazardous waste authorities in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be hazardous waste under 40 CFR Part 261.

#### PART 4 - REPORTING REQUIREMENTS (CONTINUED)

##### E. Report Submittals

All reports required by this permit shall be submitted to the City of Robinson at the following address:

City of Robinson  
 Attention: Lawrence E. Quick  
 P.O. Box 188  
 Robinson, IL 62454

1. Immediate Notification: In the case of a discharge of compatible or incompatible pollutants which causes, or may cause a violation of the User's Wastewater Discharge Permit or violation of the regulatory requirements of this Ordinance, it shall be the responsibility of the User to notify the City within 24 hours of becoming aware of the violation. Such discharges include, but are not limited to, accidental discharges, discharges of a non-routine, episodic nature, a non-customary batch discharge, or a slug load. The notification shall include: name of caller, name of User, location and time of discharge, type of wastewater, and concentration and volume.
2. Written Report: Within five (5) days following the incident the User shall submit to the Superintendent a detailed written report describing the cause of the discharge and the measures to be taken by the User to prevent similar future occurrences. Follow-up reports may be required by the City as needed. Such report, or reports, shall not relieve the User of any expense, loss, damage or other liability which may be incurred as a result of damage to the POTW, fish kills, or any other damage to person or property; nor shall such report relieve the User of any fines, civil and criminal penalties, or other liability which may be imposed by this Ordinance or otherwise. Failure to report these discharges may, in addition to other remedies available to the City may result in the revocation of this permit.
3. If sampling indicates a violation, the User shall repeat the sampling and analysis and submit the results of the repeat analysis to the City within 30 days after becoming aware of the violation. Resampling is not necessary if the City performs sampling at the User between the time when the User performs its initial sampling and the time when the User receives the results of this sampling.

## PART 4 - REPORTING REQUIREMENTS (CONTINUED)

4. In the event the type, quality, or volume of wastewater discharged by the User is expected to materially and substantially change as reasonably determined by the User or the City, the User shall give a thirty (30) day notice in writing to the City. The City may require the User to make a new application to the City prior to said change. The User shall not materially and substantially change the type, quality or volume of its wastewater beyond that allowed by this permit without prior approval of the City.
5. Analytical data from a contract laboratory shall be forwarded to the City by email upon receipt. A paper report including all daily and monthly monitoring activity shall be submitted by postal mail and received by no later than the 15th day of the following month. Semiannual monitoring data shall be submitted upon receipt and by no later than June 30 and December 31 of the current year.
6. Bypass means the intentional diversion of wastestreams from any portion of an Industrial User's treatment facility. Further information can be found at 40 CFR 403.17(c) and reporting is required.
  - a. If the User knows in advance of the need for a bypass, it shall submit prior notice to the City, if possible at least ten (10) days before the date of the bypass.
  - b. User shall submit oral notice of an unanticipated bypass that exceeds applicable Pretreatment Standards or local limits to the City within 24 hours from the time the User becomes aware of the bypass. A written submission shall also be provided within five (5) days of the time the User becomes aware of the bypass. The written submission shall contain a description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass.

Bypass is prohibited and the City may take enforcement action against the User for a bypass, unless;

- c. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
- d. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance;
- e. The User submitted the notices as required in (6)(a) and (6)(b) above.  
The City may approve an anticipated bypass, after considering its adverse effects, if the City determines that it will meet the three conditions, (6)(c) to (6)(e) above.

#### PART 4 - REPORTING REQUIREMENTS (CONTINUED)

7. Upset means an exceptional incident in which there is unintentional and temporary noncompliance with categorical Pretreatment Standards or local limitations because of factors beyond the reasonable control of the User. An Upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

#### PART 4 - REPORTING REQUIREMENTS (CONTINUED)

User must submit the following information to the City within 24 hours of becoming aware of the Upset and provide a written submission within five (5) days.

- a. A description of the Indirect Discharge and cause of noncompliance;
- b. The period of noncompliance, including exact dates and times or, if not corrected, the anticipated time the noncompliance is expected to continue.
- c. Steps being taken and/or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

#### PART 5 - SPECIAL CONDITIONS

A. Additional/Special Monitoring Requirements (Reserved)

B. Reopener Clause

1. This permit may be reopened and modified to incorporate any new or revised requirements developed by the City of Robinson as are necessary to ensure POTW compliance with applicable NPDES and sludge management requirements promulgated by EPA.

C. Compliance Schedule (Reserved)

D. Payment of Surcharge, User Charge, or Additional Fees

The user shall pay to the City the required surcharge or user charge fee for industrial wastewater treatment, such surcharge or user charge is in addition to penalties, costs or other relief authorized by the City's ordinances or applicable laws. Payment shall be made within 30 days of billing.

#### PART 6 - STANDARD CONDITIONS

City of Robinson Sanitary Sewer Pretreatment Ordinance No. 2020-0-30 is the legal authority for this permit and the City's pretreatment program.

## PART 6 - STANDARD CONDITIONS (CONTINUED)

1. Records Retention.
  - a. The User shall retain and preserve, for no less than three (3) years (including documentation associated with Best Management Practices), any correspondence, records, books, memoranda, reports, documents, and any and all summaries thereof relating to monitoring, sampling, and chemical analyses made in connection with its wastewater discharge. These materials shall be made available to the City, IEPA, and USEPA upon request.
  - b. All records that pertain to matters that are the subject of administrative adjustment or any other enforcement or litigation activities shall be retained and preserved by the User until all enforcement activities and related review proceedings have concluded and all periods of limitation with respect to any and all appeals have expired. Records of any contractor or agent of the User must be retained by the User.
2. Right of Entry. The User is required to allow City representatives, the Illinois Environmental Protection Agency, the United States Environmental Protection Agency, or their representatives, ready access upon presentation of credentials at reasonable times to all parts of its premises in which a discharge source or treatment system is located or in which records required by this Ordinance and are kept for the purposes of inspection, sampling, examination and photocopying of said records and for the performance of any of their duties.
3. Dilution. No User shall increase the use of process water or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate pretreatment to achieve compliance with the limitations contained in the National Pretreatment Categorical Standards (NPCS) (when effective), or in any other pollutant specific limitation developed by the City or State.
4. Violations. The permit issued by the City may be revoked when, after inspection, monitoring or analysis it is determined that the discharge of wastewater to the sanitary sewer is in violation of Federal, State, or local laws, ordinances, or regulations. Additionally, falsification or intentional misrepresentation of data or statements pertaining to the permit application or other required reports may be cause for permit revocation.
5. Confidential Information. Except for information determined to be confidential under City of Robinson Sanitary Sewer Pretreatment Ordinance No. 2020-0-30, this permit and all information pertaining to this permit shall be available for public inspection at the Superintendent's office.
6. Wastes. Waste generated by the User which is not discharged to the City's POTWs shall be disposed in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

PART 6 - STANDARD CONDITIONS (CONTINUED)

7. Limitations on Permit Assignment and Transfer. Permits are issued to a specific facility for a specified operation and are not assigned to another use or transferable to any location without the prior written approval of the City. Sale of a facility shall obligate the new owner or operator to seek prior written approval of the City for continued discharge to the sewer system. The User shall furnish a copy of the current permit to the new owner or operator. The new owner or operator must apply for a temporary permit.
8. Permit Reissuance. The City shall notify a User One Hundred and Eighty (180) days prior to the expiration date of the User's permit. The facility shall apply for reissuance of the permit on a form provided by the City.
9. Modification or Revision of Permit. The permit issued to the User may be subject to modification during the term of the permit, as limitations or requirements in the City's ordinance are changed. The User shall be notified of any changes in the permit thirty (30) days prior to the effective date of the change.
10. Civil and Criminal Penalties. Any person who violates the City of Robinson Sanitary Sewer Pretreatment Ordinance No. 2020-0-30 or orders authorized by the City of Robinson Sanitary Sewer Pretreatment Ordinance No. 2020-0-30, or this permit shall be liable for any damage to the City. Upon conviction of such violation, the person(s) responsible for the violation shall forfeit not less than One Thousand (\$1,000.00) Dollars for each violation, together with the costs of prosecution. Each day a violation continues shall be deemed a separate offense.
11. Notice of Potential Problems, including Slug Loadings. The User shall notify the City immediately of any changes at its facility affecting the potential for a slug discharge.
12. Recording of Results. For each measurement or sample taken pursuant to the requirements of this permit, the User shall record the following information:
  - a. Exact place, date, and time of sampling;
  - b. The dates the analyses were performed;
  - c. The person(s) who performed the analysis;
  - d. The analytical techniques or methods used and the result.
13. Severability. Should any section, clause, sentence or provision in this Wastewater Discharge Permit be declared by a court of law to be invalid or unconstitutional, such determination shall not affect the validity of any other section, clause, sentence or provision of this permit which can be given effect without such invalid part or parts, as every section, clause, sentence and provision of this permit is deemed severable.
14. Signatory Requirements. All reports required by this permit shall be signed by an authorized representative of the User.

PART 6 - STANDARD CONDITIONS (CONTINUED)

15. Pollutant Waiver. The City is not issuing pollutant waivers. This includes all local limitation pollutant parameters. Pollutants regulated by a categorical Pretreatment Standard must be sampled for, analyzed, and will not be given a waiver.

Standard conditions of this permit include all provisions contained in the City of Robinson Sanitary Sewer Pretreatment Ordinance No. 2020-0-30.